

USEPA TRANSMITTAL INFORMATION FOR
HYDE PARK/BLOODY RUN DOCUMENTS

2F

TO: G. SWANAHAN
W. WALSH
J. MARSHALL / L. JOHNSON
R. TURPIN
C. MORGAN
C. KLEVENO / J. BULMAN

FROM: Dr. Joseph Spatola, USEPA Program
Coordinator for Hyde Park/Bloody Run
U.S. Environmental Protection Agency
Region II
Office of Emergency and Remedial
Response, Hazardous Waste Sites Branch
26 Federal Plaza
New York, New York 10278
FTS 264-4183

J. JOSEPHS, N. LEWIS, D. BARNE

☒ For your review

☐ Draft plans, specifications, and/or protocols

☐ For your information

☐ Draft report

Date of correspondence 05-09-84

☒ Final plans, specifications, and/or protocols

Date of E & E transmittal 05-14-84

☐ Final report

Activity Code (file reference):

0-2

☐ Other: _____

Description of Attachment: Letter from C. Nichter (OCC) to
N. Nosenchuk / J. Spatola (EPA/State) re: HYDE PARK
REMEDIAL PROJECT - TEMPORARY STORAGE OF
ORGANICS

Consent Decree Reference(s): Para 7(a), p 11; addendum I,
para E(1), pp 1-33, 1-34.

Review Schedule:

Date Item Received From OCC	Date Comments Due to Dr. Spatola*	Exchange Comments With State	Meet With State/Resolve Comments	Date EPA/State Comments Due to OCC	EPA/State Meet With OCC to Resolve Comments
<u>5/14/84</u>	<u>5/18/84</u>				

Comments: Verbal comments needed by 05-18-84 followed
by WRITTEN COMMENTS.

*Please send a copy of all technical comments to: Ms. Julia Schwartz
c/o Ecology and Environment, Inc.
195 Sugg Road, P.O. Box D
Buffalo, NY 14225

XC (w/o attachments):

XC (w/attachments):

R. Holmes
R. Stecik (NUS)
G. Rusk
F. Russo

J. Spatola
G. Pavlou
J. Wilcox (E & E Task Leader)
J. Schwartz
NU-434 files 0-2, NU-432 File E & E Corres.

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MAY 14 1984

Occidental Chemical Corporation

May 9, 1984

Norman H. Nosenchuck, P.E.
~~Director Division of Solid Waste~~
NYS Department of Environmental Conservation
50 Wolf Road
Albany, New York 12233

Joseph Spatola, PhD
Hyde Park Program Coordinator
United States EPA, Region II
26 Federal Plaza
New York, New York 10278

Re: Hyde Park Remedial Project, Temporary Storage of Organics

Dear Sirs:

Occidental Chemical Corporation (OCC) has reviewed the EPA/State comments on the subject facility contained in your letter of November 22, 1983. OCC's response is as follows:

General Comments

2. Respiratory protection for the Hazardous Waste Landfill Specialist or operator is based on the air monitoring data obtained during the current trailer loading operation and during the pump tests carried out in 1983. This data indicates that the organic vapor levels do not warrant continuous respiratory protection, and the chemicals involved can be removed by activated carbon.
3. The liquid used for testing was NAPL and APL.

Detailed Comments

1. The location of the tanks is based on professional judgement considering the historical operations of the site.
3. The discharge will be returned to the pump suction line which leads from the lagoon.



Special Environmental Programs

Hooker Chemical Center, 360 Rainbow Boulevard South, Box 728, Niagara Falls, New York 14302 716/286-3000

Occidental Chemical

Subject: Hyde Park Remedial Project,
Temporary Storage of Organics

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8. The rationale for pH control of the aqueous layer is based on the NACE-TM-01-69 results. Organic liquids do not exhibit a pH, it is only possible to test the pH of an aqueous phase in equilibrium with an organic phase.
9. Considering that the tanks will be filled once and emptied once over a few weeks period, automatic monitoring and shutoff controls are not warranted. Visual monitoring is adequate to prevent overfilling.
15. At the time of disposal in the landfill, the tanks will be filled with solid waste and sand or some other solid fill to eliminate the large void space in the landfill.
18. The existing contours are shown on Drawing A-11-17930.
19. The turning radii on the gravel road have been designed to accommodate the C-50 tractor and trailer design approved by the American Association of State Highway Officials (AASHO-C-50).

If you have any further questions on this submission, please call me at (716)286-3609.

Respectfully,



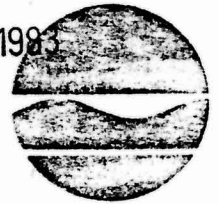
John R. Nichter
Hyde Park Coordinator

2095eJRNbma

copies: J. Slack - 5 copies
J. Schwartz - 5 copies
P. Buechi - 3 copies

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NOV. 28 1983



Henry G. Williams
Commissioner

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233-0001

TELEX

Mr. John Nichter
Hyde Park Coordinator
Occidental Chemical Corporation
360 Rainbow Boulevard South
Niagara Falls, New York 14302

NOV 22 1983

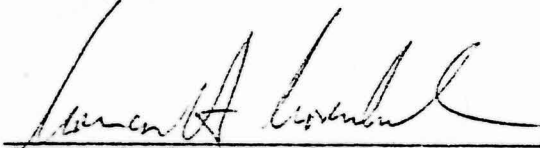
Dear Mr. Nichter:

Re: Hyde Park Remedial Project
Temporary Storage of Organics

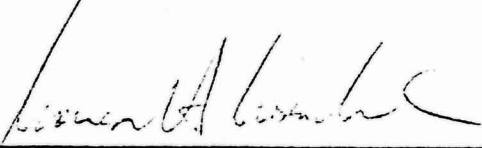
EPA/State have reviewed the response made in your letter of October 12, 1983 and the documents referenced in that letter. EPA/State believe that OCC's responses are generally acceptable and consistent with the requirements of the Hyde Park Settlement Agreement and authorize construction of the "Temporary Storage Facility." However, OCC should not proceed with the operational phase until final approval is granted by EPA/State and the concerns raised in the enclosed comments are addressed. Enclosed are EPA/State comments on the Temporary Storage of Organics at Hyde Park Landfill Site.

If you have any questions on the enclosed EPA/State comments, please contact Mr. Joseph L. Slack at 518/457-4343.

Sincerely,



Joseph A. Spatola, Ph.D
U.S. Environmental Protection Agency
Hyde Park-Bloody Run Area
Program Coordinator



Norman H. Nosenchuck, P.E.
Director
Division of Solid and Hazardous Waste
State Hyde Park-Bloody Run Area
Program Coordinator

cc: G. Anders Carlson, NYSDOH
A. Goldweber, NYSDOL
J. Schwartz, Ecology & Environment ✓

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (USEPA)
AND NEW YORK STATE
COMMENTS ON OCCIDENTAL CHEMICAL CORPORATION (OCC)
PLAN FOR TEMPORARY ON-SITE STORAGE FOR ORGANICS,
HYDE PARK LANDFILL, JUNE 1983 AND OCTOBER 12, 1983

I. General Comments

1. OCC's response is acceptable.
2. OCC's response is generally acceptable, however OCC should provide clarification for the rationale for the selection of respiratory protection, i.e. worker job classification. The information should be provided in a timely fashion, but will not affect the initiation of the installation work at the site.
3. The type of liquid used in the test is not clearly reported. If the liquid used in the test was NAPL, the test results are acceptable.
4. OCC's response is acceptable.
5. OCC's response is acceptable. However, the correct reference for handling tank failure should be Section 5, Emergency Response, Page 85 of the Permit Application RCRA Part B Vol. II.
6. OCC's response is acceptable.
7. OCC's response is acceptable.

II. Detailed Comments

1. It seems like the response is made on subjective evaluation. Does OCC have field data to support this response?
2. OCC's response is acceptable.
3. OCC's response is acceptable. In the event of an obstruction, the discharge of the pressure relief system should be returned to the

lagoon(s).

4. OCC's response is acceptable.
5. OCC's response is acceptable.
6. OCC's response is acceptable. OCC should check the conditions of the hoses more frequently.
7. OCC's response is acceptable.
8. It is assumed that the rationale for maintaining the pH above three is based on the NACE TM-01-69 test results. If so, please confirm this. If not, please provide the rationale for maintaining the pH above three. It is likely that the pH of the NAPL would be less than the pH of aqueous layer. Hence, it is recommended that multiple readings of pH be taken at several places, at various depths. The lowest value of the pH should be used as a check.
9. In addition to the manual overfilling control, the transfer hoses should be equipped with back pressure shutoffs or some other automatic monitoring equipment to prevent overfilling.
10. OCC's response is acceptable.
11. OCC's response is acceptable.
12. OCC's response is acceptable.
13. OCC's response is acceptable.
14. OCC's response is acceptable.
15. OCC has not been responsive to this EPA/State comment. EPA/State request that OCC provide detailed information describing the plan of disposal of temporary storage tanks.
16. OCC's response is acceptable.
17. OCC's response is acceptable.

18. It is assumed that the existing contours are shown on Drawing A-11-17930. Please confirm this. If not, please provide the existing contour information.
19. OCC did not respond to the first part of the EPA/State comment. Please verify whether the turning radii on the existing gravel road at the southwest and northwest corners of the landfill are sufficient to safely accommodate tractor-trailer combination equipment. Also, please provide us the specifications of tractor-trailer, such as axle-axle distances, lengths of the trailer, and widths of the trailer and tractor, etc.
20. Please read comment 19.
21. OCC's response is acceptable.
22. OCC's response is acceptable.
23. OCC's response is acceptable.
24. OCC's response is acceptable.